

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Theresa Kepple	:	Case No.16-24304CMB
	:	Chapter 13
Debtor(s)	:	
Specialized Loan Servicing LLC, as	:	
Servicer for Wilmington Savings Fund	:	Re Doc.78
Society, FSB, DBA Christian Trust, not	:	
In its individual capacity, but solely in	:	
Its Capacity as owner Trustee for WF	:	
19 Grantor Trust	:	
Movant(s)	:	
	:	
vs.	:	
Theresa Kepple, and Ronda J.	:	
Winnecour, Trustee	:	Hearing Date
Respondent(s)	:	

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

Ronda J. Winnecour, Chapter 13 Trustee, by her undersigned counsel,
respectfully represents the following:

1. Specialized Loan Servicing LLC, as servicer for Wilmington Savings Fund Society, FSB, DBA Christian Trust, not in its individual capacity, but solely in its capacity as Owner Trustee for WF 19 Grantor Trust, a secured creditor in the above-captioned bankruptcy case, requests relief from stay with regard to real property located at 229 Moran Street, Butler, PA 16002.
2. According to the Debtor's Schedule A, the property value is \$150,000.00.
3. The Debtor's Schedule D lists the amount of Ditech Mortgage's secured claim as \$52,000.00. The Debtor's Schedule D also lists the amount of Butler County Tax Claim Bureau's secured claim as \$2,600.00.
4. The Debtor's Schedule C lists an exemption in the amount of \$23,675.00 under 11 U.S.C. § 522(d)(1).

5. The Movant states that \$9,639.00 is left due and owing on Movant's claim and is further subject to a first mortgage in favor of U.S. Bank, N.A., c/o Ditech Financial LLC in the amount of \$76,877.56 relating to claim 8.
6. Substantial equity may still exist in the property which should be preserved for the estate.
7. Movant's claim is not included on debtor's plan, therefore, the Trustee is not authorized to distribute funds to Movant.

WHEREFORE, the Trustee respectfully requests that Movant's Motion be DENIED.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: 06/13/18

by /s/ Jana S. Pail
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CERTIFICATE OF SERVICE

I hereby certify that on the 13th of June 2018, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire
Assistant U.S. Trustee
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1001 Liberty Avenue
Pittsburgh PA. 15222

James C. Warmbrodt, Esquire
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Philadelphia PA 19106

Theresa Kepple
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Butler PA 16002

Shawn Wright, Esquire
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/s/Dianne DeFoor
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